

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DELAWARE DISPLAY GROUP LLC)	
and INNOVATIVE DISPLAY)	
TECHNOLOGIES LLC,)	
)	C.A. No. 13-2108-RGA
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
LENOVO HOLDING CO. INC., and)	
LENOVO (UNITED STATES) INC.,)	
)	
Defendants.)	
DELAWARE DISPLAY GROUP LLC)	
and INNOVATIVE DISPLAY)	
TECHNOLOGIES LLC,)	
)	C.A. No. 13-2109-RGA
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
LG ELECTRONICS, INC.,)	
LG ELECTRONICS U.S.A., INC.,)	
LG DISPLAY CO., LTD., and)	
LG DISPLAY AMERICA, INC.,)	
)	
Defendants.)	
DELAWARE DISPLAY GROUP LLC)	
AND INNOVATIVE DISPLAY)	
TECHNOLOGIES LLC,)	
)	C.A. No. 13-2112-RGA
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
VIZIO, INC., et al.)	
)	
Defendant.)	

**DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT OF INVALIDITY**

Defendants LG Display Co., Ltd., LG Display America, Inc., LG Electronics, Inc., LG Electronics USA, VIZIO, Inc., Lenovo Holding Co., Inc. and Lenovo (United States) Inc. (collectively “Defendants”), by and through undersigned counsel, hereby move for summary judgment that Plaintiffs Delaware Display Group LLC and Innovative Display Technologies LLC asserted patents – U.S. Patent Nos. 7,537,370 and 7,434,974 – are invalid under 35 U.S.C. §§ 102, 103. The grounds for this motion are fully set forth in the Opening Brief in Support, filed concurrently herewith.

Respectfully submitted,

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Dated: August 26, 2016

CERTIFICATE OF SERVICE

I, Benjamin J. Schladweiler, hereby certify that on August 26, 2016, I caused the foregoing ***Defendants' Motion for Summary Judgment of Invalidity*** to be served via electronic mail upon the following counsel of record:

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